

EXHIBIT 3

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JOHNNY M. HUNT,	:
	:
Plaintiff,	:
	:
-against-	:
	:
SOUTHERN BAPTIST CONVENTION,	:
GUIDEPOST SOLUTIONS LLC, and	:
EXECUTIVE COMMITTEE OF THE SOUTHERN	:
BAPTIST CONVENTION,	:
	:
Defendants.	:
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Plaintiff, by counsel, hereby provides his responses to Defendant Guidepost Solutions LLC's First Set of Interrogatories to Plaintiff.

To avoid undue and unnecessary repetition, each of the following responses is made subject to and incorporates the following general objections:

2. Plaintiff objects to the interrogatories to the extent they seek to impose discovery burdens or responsibilities upon Plaintiff beyond those specifically required by the Federal Rules of Civil Procedure. Plaintiff will respond to the interrogatories in a manner consistent with his obligations under the Federal Rules of Civil Procedure.

3) Identify each of your employers since you entered the ministry and each church at which you have served, whether or not in a formal employment relationship, including without limitation, Hiland Park Baptist Church, in each case setting forth the dates, position(s) held, and contact information, if known, of the Person(s) responsible for supervising you and maintaining your employment records, including their name, address, email address and telephone number.

ANSWER: Plaintiff objects to Interrogatory No. 3 as vague and ambiguous to the extent it asks him to identify his “employers” without regard to whether he had an “employment relationship.” By definition, an entity can only be an “employer” if there is an “employment relationship.” Subject to this objection, Plaintiff identifies the following churches he has served since he entered the ministry in 1976. Additionally, Pastor Johnny is currently providing services

to Hiland Park Baptist Church on an as-needed basis from February 2023 to present. Pastor Steven Kyle is his supervisor.

Year	Position	Church	Chairman of Deacons/Supervisor
1976-1979	Pastor	Lavonia Baptist Church - South Carolina	Bob Peeler (deceased)
1979-1981	Pastor	Falls Baptist Church - Wake Forest, North Carolina	Walter Haskins
1981-1986	Pastor	Long Leaf Baptist Church, Wilmington, North Carolina	Wilbur Russ (deceased)
1986-2019	Pastor	First Baptist Church, Woodstock (Georgia)	The Chairman of the Deacons position at First Baptist Woodstock was elected each year.

2019- May 2022	Senior Vice President	North American Mission Board (NAMB)	Kevin Ezell
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11) Identify each Person with whom you have had any communications concerning your extramarital encounter with the Survivor, the Report, or the allegations in the Complaint.

ANSWER: After the encounter, but before the Report was published, Plaintiff only had communications regarding the encounter with Janet Hunt (spouse), [REDACTED] and Roy Blankenship. After the Report was published, Plaintiff communicated with the following:

- Plaintiff's attorneys
- Samantha Kilpatrick, Guidepost Senior Managing Director
- Russell Holske, Guidepost Senior Managing Director
- Kevin Ezell, NAMB President
- Jeremy Morton, Pastor at First Woodstock and SBC Executive Committee Member
- Jim Law, Former Associate at FBCW and employee of NAMB
- Matt Lawson, Staff member of FBCW
- Stephen and Jennifer Kyle, Plaintiff's Pastor and wife at Hiland Park Baptist Church, Panama City, FL and Part of the Accountability/Restoration Group

- Other members of the Accountability/Restoration Group:
 - Benny Tate, Pastor of Rock Springs Church, Milner, GA
 - Mark Hoover, Pastor of New Spring Church, Wichita, Kansas
 - Mike Whitson, Pastor of Indian Trail Church, Indian Trail, NC
- Steve and Vickie Flockhart, Pastor New Season Church, Hiram, GA
- Jennifer and Caleb Duncan, friends
- Mike Orr, Pastor of First Baptist Church, Chipley, FL
- Scott and Millie White, former Associate at FBCW/ Pastor of Windmark Church, St. Joe, FL
- Eddie and Terrie Carswell
- Sarah Hill
- Ginger and Ron Anspaugh
- John and Denise Kisse
- Plaintiff's Children and Spouses:
 - Deanna and Jake Carswell
 - Hollie and Pete Hixson
- Plaintiff's Grandchildren:
 - Addie Hixson
 - Katie and Nich Oswald
 - Carson Carswell
- Spiritual Care Team from Woodstock First Baptist Church:
 - Jeremy Morton, Pastor and member of SBC Executive Committee
 - James Eubanks, staff member of FBCW
 - Jim Woodward, lay leader
 - Alan Gotthardt, lay leader
 - Todd Thrasher, lay leader
- Counselor at OnSite Ministries, Nashville, TN
- Counselors: David & Teresa Ferguson, Relational Care, Austin, TX
- Carl Lietz (attorney)
- David Bouchard (attorney)
- Johnnie Moore (publicist)
- Shane Pruitt (employee NAMB)

VERIFICATION OF RESPONSES TO INTERROGATORIES ONLY

I, Johnny Hunt, on behalf of myself only, and only in my capacity as a Plaintiff in this lawsuit, state that the factual matters stated for me in the above Responses to Interrogatories are either based on my personal knowledge or information supplied or assembled at the direction of me, and I believe the factual matter stated in the above Responses to Interrogatories is true and correct.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing VERIFICATION OF RESPONSES TO INTERROGATORIES ONLY is true and correct.

Dated: 9-15-2023

Signed: Johnny Hunt

Printed: Johnny Hunt

Dated: September 18, 2023

/s/ Patrick J. Sanders

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on September 18, 2023, on the following counsel via email only:

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